

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

VAL J. WILLIAMS,  
Defendant.

MAGISTRATE'S DOCKET NO.  
CASE NO. 04-5131M

COMPLAINT FOR VIOLATION  
U.S.C. Title 18, Section 1343

BEFORE J. Kelley Arnold, United States Magistrate Judge,  
United States Courthouse, 1717 Pacific Ave., Room 3100, Tacoma, Washington.

The undersigned complainant being duly sworn states:

**COUNTS ONE AND TWO**

(Wire Fraud)

**A. THE SCHEME TO DEFRAUD AND TO OBTAIN MONEY AND PROPERTY**

1. Beginning at a time unknown but no later than in or about January 2004, and continuing until the date of this Complaint, within the Western District of Washington and elsewhere, VAL J. WILLIAMS knowingly and willfully devised, executed, and attempted to execute a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises as described below.

2. The essence of the scheme was to contact persons by telephone to inform them, falsely, that they had won a substantial amount of money, *e.g.*, \$500,000, from the "American

Family Publishing” sweepstakes and that they needed to wire money to an Assistant United States Attorney at an address in Seattle, Washington, to establish a “tax escrow account” before the prize money could be released.

3. It was a part of the scheme that the victim was instructed to wire the money via Western Union or Moneygram to an Assistant United States Attorney named VAL WILLIAMS or some other name.

4. It was further a part of the scheme that the money would be received at a Western Union or Moneygram outlet in the Tacoma, Washington, area by VAL J. WILLIAMS.

**B. EXECUTION OF THE SCHEME**

5. On or about the dates set forth below, within the Western District of Washington and elsewhere, VAL J. WILLIAMS, for the purpose of executing and attempting to execute the scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, knowingly and willfully transmitted and caused to be transmitted in interstate commerce, by means of a wire communication, certain writings, signs, and signals, that is, a wire transfer of funds as described below to the attention of VAL WILLIAMS in the Western District of Washington:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Wire Transfer Service Provider</u>	<u>Originating City</u>
1	May 21, 2004	\$286.12	Moneygram	Brady, Texas
2	June 23, 2004	\$9.85	Western Union	Plano, Texas

All in violation of Title 18, United States Code, Section 1343.

DANIEL E. BENNETT, being first duly sworn on oath, deposes and says:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed for two years. I am assigned to the Seattle Field Office of the FBI on the squad that investigates white collar crime, and in that capacity I have participated in investigations involving wire fraud, securities fraud, and other fraud and white collar crime.

1           2. I make this affidavit in support of a Complaint charging VAL J. WILLIAMS with  
2 Wire Fraud, in violation of Title 18, United States Code Section 1343, for a scheme to defraud  
3 persons through false representations to the persons that they would receive a substantial  
4 sweepstakes prize if they would wire funds to an Assistant United States Attorney in Seattle,  
5 Washington, to establish a "tax escrow account" that was necessary for the prize to be awarded.  
6 I have set forth only the facts that I believe are necessary to establish probable cause for the  
7 charge set forth herein.

8           3. For the past 60 days I have been investigating allegations by victims that a man, who  
9 would identify himself by the first name of William and one of several last names including  
10 Grant, Stacy, and Stanek. The caller told the victims that they had won \$500,000 in the  
11 "American Family Publishing" sweepstakes. The caller would further tell the victim that he  
12 would fly in to the victim's regional airport within a few days to present the award check, to be  
13 accompanied by a camera crew, balloons, and limousines. The caller would refuse to provide a  
14 return phone number or would provide a number that would not be answered if the victim called.

15           4. The caller would tell the victim that before the prize money could be awarded, the  
16 victim would have to set up a "tax escrow account" to be administered by the Federal Reserve  
17 Bank through an Assistant United States Attorney with an address of 1015 Second Avenue,  
18 Seattle, Washington. The caller would explain that the account was necessary because of past  
19 troubles with the Internal Revenue Service that American Family Publishing had when winners  
20 did not pay their income taxes on the winnings. Victims were provided with various names of  
21 the Assistant United States Attorney to whom they were to wire funds, via Western Union or  
22 Moneygram, in order to establish the account. None of the names that the caller provided was  
23 that of an actual Assistant United States Attorney in Seattle, Washington. One of the names  
24 frequently provided was Vale Williams. The address of 1015 Second Avenue is that of the  
25 Federal Building in Seattle and is not the location of the United States Attorney's Office.

26           5. The caller required victims to wire varying amounts of money for the tax escrow  
27 account, ranging from a few hundred dollars to nearly \$2,000. Once the victims wired the  
28

1 money, the victims would never hear from the caller again. To date, I am aware of about five  
2 different victims.

3 6. As part of my investigation I checked FBI records regarding VAL WILLIAMS and  
4 discovered that a person by that name had been prosecuted federally in Chicago, Illinois, for  
5 wire fraud for a remarkably similar scheme. On July 6, 2000, FBI agents arrested VAL J.  
6 WILLIAMS in Everett, Washington, in connection with that case, and interviewed him.  
7 WILLIAMS is a black male with a date of birth of 1/16/1968. WILLIAMS confessed to the  
8 crime and told the agents that he had operated a fraudulent scheme since April 1999 in which he  
9 telephoned people all over the United States and told them they had won \$500,000 in a lottery,  
10 but that in order to receive the money, they would have to wire, via Western Union, anywhere  
11 from \$400 to \$5,000 to settle the taxes associated with the lottery winnings. WILLIAMS further  
12 explained that he told the victims he was with the Federal Reserve Bank and that he was  
13 contacting them on behalf of the United States Attorney. WILLIAMS told the agents that he  
14 used the Federal Reserve Bank and United States Attorney with victims to make his scheme  
15 sound credible.

16 7. On May 24, 2004, I spoke with Heather Keith of Brady, Texas, by telephone. She  
17 reported that she had been contacted by William Grant of American Family Publishing on  
18 May 21, who told her that she had won \$500,000 in a sweepstakes. He instructed her to set up a  
19 tax escrow account in the amount of \$4,986.12, and asked her to submit either half (\$2,500) or  
20 one-third (\$1,960). After Keith informed Grant that she could not afford that, they agreed upon  
21 \$286.12. Grant directed her to wire the funds, via Moneygram at Walmart, to Assistant United  
22 States Attorney Val Williams. Keith wired the funds the same day, May 21, and never heard  
23 from Grant again.

24 8. After interviewing Keith, I obtained records from Walmart for the transaction that  
25 indicated the funds were received at America's Cash Express, 5013 South 56th Street, Suite G,  
26 Tacoma, Washington. On June 3, 2004, I interviewed Kristen Flor, an employee of America's  
27 Cash Express. She informed me that she first saw VAL WILLIAMS on May 21, 2004, when he  
28 came to the store to receive a Moneygram. She remembered the transaction well because

1 WILLIAMS made nasty comments about some of her co-workers. I showed her the Moneygram  
2 document I had obtained, and Flor identified it as the form used in that transaction. She had  
3 WILLIAMS complete the form, and she requested photo identification. WILLIAMS provided a  
4 Washington Driver's License, and Flor recorded the number, WILLIVJ325BW, and the  
5 expiration date of 1/16/07. She also compared the face on the license to WILLIAMS and saw  
6 that they matched. She then provided the funds to WILLIAMS. Flor described WILLIAMS as a  
7 black male, 5'9" to 6' in height, 180-185 pounds in weight, 21-27 years old. Flor recalled that  
8 she had seen WILLIAMS on one other occasion at another office of America's Cash Express in  
9 Tacoma, on June 1, 2004, when he attempted unsuccessfully to receive another wire transfer.

10 9. I obtained a Washington Driver's License record for VAL J. WILLIAMS, and it  
11 matches the number that Flor recorded on the Moneygram form. I also conducted a  
12 computerized search for criminal history for VAL J. WILLIAMS and learned that he is a black  
13 male, date of birth 1/16/1968, 6' 3" in height, 170-185 pounds in weight, and had a last known  
14 address 5538 Cheyenne Loop Road, #B, Tacoma, Washington 98409. According to this record,  
15 the license expired in 1994, and I have not been able to resolve the discrepancy with the  
16 expiration date recorded by Flor.

17 10. On the morning of June 23, 2004, I spoke with Buster Ellis of Plano, Texas, by  
18 telephone. He reported that he was contacted by William Stenek of American Family Publishing  
19 on June 22 and informed that he had won \$500,000 in a sweepstakes. The caller told him that he  
20 needed to wire \$985 to Assistant United States Attorney VAL WILLIAMS in Seattle,  
21 Washington. At the time I spoke to Ellis, he had not yet wired any funds and was expecting  
22 another call. Ellis agreed to assist in my investigation by wiring some funds.

23 11. I contacted Western Union and made arrangements with their security contact to  
24 place a "suspend" order on the wire transfer to be made by Ellis. A suspend order informs the  
25 Western Union representative at the receiving end of the money wire to contact law enforcement  
26 instead of paying out the funds. The Western Union security contact suggested that the wire be  
27 for \$9.85 rather than \$985.00 in order to reduce the risk of losing much money, as that  
28 discrepancy could be explained as a decimal point error if necessary.

1           12. At approximately 12:30 p.m. on June 23, 2004, Ellis informed me that he had wired  
2 the \$9.85 in funds to VAL WILLIAMS, Seattle, Washington, via Western Union.

3           13. Soon thereafter, Ellis called me again to inform me that the caller had contacted him  
4 to say that VAL WILLIAMS had checked with Western Union and discovered that the wire was  
5 for only \$9.85. The caller told Ellis to wait for another phone call.

6           14. I then made arrangements to wire \$985.00 in funds provided by the FBI to VAL  
7 WILLIAMS via Western Union. Due to time constraints and a desire to avoid Ellis having to  
8 provide that amount of money, the wire was arranged by the FBI from Seattle. With Western  
9 Union's assistance, we were able to ensure that the wire would not appear to have originated in  
10 Seattle.

11           15. At approximately 5:15 p.m., on June 23, Ellis contacted me to report the caller's new  
12 instructions to wire \$985.00 to Stacy Young. Upon receiving those instructions, I caused the  
13 FBI to send the \$985 wire to Stacy Young. I also arranged with Western Union to have a  
14 suspend order lodged on this wire so that Western Union could alert myself and other law  
15 enforcement when someone went to receive the funds.

16           16. At approximately 5:45 p.m., I received a call from a Western Union representative  
17 informing me that someone was attempting to receive the \$985 wire at the Lakewood,  
18 Washington, Safeway store. With the assistance of the Tacoma and Lakewood Police  
19 Departments, law enforcement officers and agents arrived at the Safeway within a few minutes.  
20 A person had appeared at the store to collect the funds, had identified himself as Stacy Young,  
21 and had left the store once without collecting the wire. While I was interviewing store clerks  
22 and reviewing security camera footage, I was informed that a suspect had been detained outside  
23 of the Safeway. The suspect was positively identified as VAL J. WILLIAMS. Two Safeway  
24 clerks observed WILLIAMS as he was sitting in the back of a police cruiser and positively  
25 identified him as "Stacy Young".

26           17. At the Tacoma police station, I advised WILLIAMS of his Miranda rights, and he  
27 waived his rights. I examined the Washington Driver's License that WILLIAMS had in his  
28 possession. The license bore the same number and expiration date of 1/16/07 that had been

1 recorded by Flor of America's Cash Express. I also interviewed and obtained a written  
2 statement from WILLIAMS. He admitted operating the fraudulent scheme described in this  
3 Complaint. That is, he admitted that he had called numerous people, claiming to be with  
4 American Family Publishing, and induced them to wire him money for a tax escrow account  
5 with an Assistant United States Attorney so that they could receive a \$500,000 sweepstakes  
6 prize. WILLIAMS stated that in these calls he claimed to be William Stacy, William Stenek,  
7 William Grant, or some other name that he invented, and that he changed his voice during those  
8 calls to sound older. WILLIAMS stated that he typically received between \$200 and \$2000  
9 from the victims. He stated that he had made \$16,000 through this scam since March 2004 and  
10 estimated that he had made between \$30,000 and \$60,000 since the beginning of 2004. Upon  
11 receiving the victim's money, WILLIAMS used it for himself and never called the victim again.  
12 WILLIAMS acknowledged knowing that his actions were wrong. WILLIAMS also admitted  
13 that he had performed this type of scheme as early as 1993.

14 18. Based on the foregoing information, I believe there is probable cause that VAL J.  
15 WILLIAMS has committed the crime of Wire Fraud, in violation of Title 18, United States  
16 Code, Section 1343.

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20 \_\_\_\_\_  
DANIEL E. BENNETT, Complainant  
Special Agent, Federal Bureau of Investigation

21  
22 Complaint and affidavit sworn to before me this \_\_\_\_ day of June, 2004.

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25 \_\_\_\_\_  
J. KELLEY ARNOLD  
United States Magistrate Judge